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January 29, 2021

Via ECF

Hon. Joseph A. Dickson, USMJ
U.S. District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
Court Room: MLK 2D
Newark, NJ 07101

Re: Dorsainvil v. Peim, et al.
Case No. 2:15-cv-3035-ES-JAD

Dear Judge Dickson:

This office represents defendants, Carol Gallagher and Alejandrina Sumicaid (jointly “Defendants”), in the above-referenced matter. Please accept this letter as the parties’ joint status report, submitted in accordance with the Court’s Text Order filed December 15, 2020. See Doc. No. 80. The current fact discovery deadline is February 26, 2021. To date, the parties are in the process of completing written discovery. Once written discovery is exchanged, the parties’ depositions will be noticed. As additional time is needed to complete written discovery by the parties, the parties respectfully request a sixty (60) day extension of the discovery end date, until April 27, 2021.

Thank you Your Honor for your attention to this matter

Respectfully,

s/Candice H. Rienzo

Candice H. Rienzo

cc: All Counsel via ECF